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December 3, 2018

VIA EMAIL

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Re: *Grae v. Corrections Corp. of America, et al.*, No. 3:16-cv-02267

Counsel:

We have become aware that we inadvertently produced documents protected by the attorney-client privilege and/or work product doctrine. In accordance with Federal Rule of Civil Procedure 26(b)(5)(B) and paragraph 10(a) of the Revised Stipulation and Protective Order filed in this case on February 12, 2018 (Dkt. No. 86), please promptly return the documents bearing the Bates numbers identified in the attached Exhibit A and all copies thereof to Defendants or certify in writing that the documents have been destroyed. Plaintiff and its counsel must refrain from using these documents for any purpose.

Defendants will update and/or supplement the privilege logs to reflect all documents contained in Exhibit A.

Please confirm in writing that you will abide by this request.

Best regards,



Bret M. Geckeler
of LATHAM & WATKINS LLP

CC: David Schindler
Brian Glennon
Steve Riley
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